

August, 6, 2013

Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and

Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

## Dear Commissioners:

Bloomfield Municipal Access (BMA-TV) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

BMA-TV is a Government Access Channel Serving the Township of Bloomfield, NJ and surrounding towns in Essex County, NJ along with another Educational Channel serving the same. Our programming is available to the 50,000 plus residents in Bloomfield plus another additional 250,000 plus people in surrounding towns.

We carry several programs on our channels of which are closed captioned. The onscreen video programming guide of our multichannel video programming distributor (MVPD), both Comcast and Verizon FiOS, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, both Comcast and Verizon FiOS describes the Channel as Local Programming. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Bob Duthaler, Executive Director

WBMA-TV, Bloomfield, NJ